

**REMARKS**

Claims 1-9 are pending in the application. Claims 1-9 are rejected by the Examiner.

The Examiner has objected to Figure 3 of the drawings.

Claims 4 and 7 are rejected under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 1-6 and 8-9 are rejected under 35 USC § 103(a) as being unpatentable over Seroussi et al. (US Patent No. 5,835,034) in view of Wu et al. (US Patent No. 5,903,676).

As amended, claims 1 and 9 require that the classification scheme be based upon pairwise comparisons of the causal neighbors. This is not taught by the combination. As disclosed in Seroussi, a very complicated scheme of mathematical calculations and comparisons of the results of those calculations is used to set a 'context' of the pixel. That context is then used to look up information in Huffman coding tables. See Seroussi, Figures 4 and 5 and in the text, column 8, lines 22-58.

In Wu, the classification scheme is based upon gradients between the values of the neighbors. See column 6, lines 6-55. Both of these use these to predict the value of the pixel, and then encode it. In contrast, the classification scheme disclosed in embodiments of the instant invention using the classification scheme to identify the mode used for coding and then codes the actual pixel value using the selected mode. The combination of references does not teach using pairwise comparison to select a coding mode.

It is therefore submitted that claims 1 and 9 are patentably distinguishable over the prior art and allowance of these claims is requested.

With regard to claims 2, 3 and 4, the combination of references does not teach that the classification scheme is a pairwise comparison, or that the comparisons are used to select an encoding method. Rather they teach either a complicated, addition and subtraction process

involving comparisons against a minimum and a maximum to predict a pixel value, or a gradient process, equally as complicated to predict a pixel value. The text referred to in the Seroussi reference is directed to gradients having absolute values that are near zero or are equal to zero. But this result is not reached with a simple, pairwise comparison. It is instead reached by a complicated process. It is therefore submitted that claims 2, 3 and 4 are patentably distinguishable over the prior art and allowance of these claims is requested.

With regard to claims 5 and 6, it must be noted that the combination of references predict the pixel value from the contextual classification scheme discussed above. In the instant application, the predicted pixel value is used in its coding, but not in the classification scheme. This is especially shown by claim 5, in which a predicted value is used for a continuous mode coding, but not prior to the mode being selected as continuous from the classification scheme. In claim 6, the coding scheme is conditional, but the classification of the pixel to which that coding scheme is applied is different than that used by the combination of references. It is therefore submitted that claims 5 and 6 are patentably distinguishable over the prior art and allowance of these claims is requested.

With regard to claim 8, which depends from claims 6 and through claim 6, claim 1, the combination of references does not teach, show nor suggest a classification scheme based upon pairwise comparisons prior to the conditional coding of claim 6, nor the adaptive binary encoding of claim 8. It is therefore submitted that claim 8 is patentably distinguishable over the prior art and allowance of this claim is requested.

Claims 7 is rejected under 35 USC § 103(a) as being unpatentable over Seroussi et al. in view of Wu et al., and further in view of Memon et al. ("A comparison of prediction schemes proposed for a new lossless image compression standard").

As discussed above, the combination of references of Seroussi and Wu does not teach that a classification scheme of pairwise comparisons is used to determine if a pixel is class 1,

much less that the class 1 pixels are then predictively encoded separate from the classification. The addition of Memon does not cure this deficiency, much less teach that the predictive encoding uses a median edge detector. It is therefore submitted that claim 7 is patentably distinguishable over the prior art and allowance of this claim is requested.

No new matter has been added by this amendment. Allowance of all claims is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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